

System Reoperation Strategy - Response to Comments					
Commenter	Date Received	draft date	Chapter/ Section	Comment	Response
Greg Thomas	9/18/2003	9/16/2003	Introduction	<ul style="list-style-type: none"> Increasing the water storage and flood retention capacity of reservoirs by conveying reservoir water to groundwater banks before the refill season. Changing the storage and release regime of hydropower dams to restore a semblance of natural flow conditions downstream. Modifying the rate, manner and timing of diversions of water out of the delta to avoid fishery impacts at the south delta pumps. 	Y Didn't add the following bullets because they seemed to be redundant with the first bullet related to modifying the timing and volume of releases for additional benefits. Also trying to keep a manageable number of examples.
Greg Thomas	9/18/2003	9/16/2003	Introduction	<p>Changed second bullet as follows:</p> <ul style="list-style-type: none"> Using temperature control devices in reservoirs to permit water to be released from variable depths in order to maintain thermal control for downstream fisheries manage the water temperature and water quality downstream for endangered species protection while maintaining hydroelectric power 	Y Didn't make change because previous version was developed through much discussion and proposed change didn't seem to add anything new.
Greg Thomas	9/18/2003	9/16/2003	Introduction	Delete fourth bullet	Y Didn't delete because it was developed through much discussion.
Greg Thomas	9/18/2003	9/16/2003	Current Status	Changes to paragraph on CVPIA	Y Didn't make all the changes requested because that language came largely from published material and with assistance from USBR.
Greg Thomas	9/18/2003	9/16/2003	Potential Benefits	Delete estimates of potential benefits	Y Didn't delete because estimates are very conservative and reasonable based on current discussions.
Greg Thomas	9/18/2003	9/16/2003	Potential Benefits	Add bullet on large scale restoration	Y Didn't add because this overlaps with the first bullet.
Greg Thomas	9/18/2003	9/16/2003	Case Example	Delete case example because example from NHI was removed.	Y Did not delete case example because it does a good job of explaining the benefits, costs, tradeoffs, and issues associated with system reoperation of an actual facility. Both the NHI and CALFED studies were removed from the benefits section because workshop participants felt they were too hypothetical. It should be noted that the NHI study is included in the conjunctive management strategy.
Greg Thomas	9/18/2003	9/16/2003	Issues	Delete discussion of controversial nature of system reoperation projects in relation to new projects	X Added an additional qualifier "in some cases"
Greg Thomas	9/18/2003	9/16/2003	Issues	Delete reference to potential for ecological impacts caused by changing existing operations.	Y Did not change because of conflicts with comments by other participants.
Greg Thomas	9/18/2003	9/16/2003	Issues	Delete discussion on area of origin concerns	Y Did not change because of conflicts with comments by other participants.
Greg Thomas	9/18/2003	9/16/2003	Issues	Include qualifier that groundwater quality less of an issue for groundwater banks because of availability of different banking sites	X Modified to say that groundwater quality is more of an issue for local projects than regional and statewide projects

Greg Thomas	9/18/2003	9/16/2003	Issues	Include non-profits as target for state financial assistance	X Changed text to focus on funding needs. Funding preferences are discussed in Chapter 6 - State Role &
John Mills	9/18/2003	9/16/2003	Issues	the effect of listing only two items specifically here and then lumping other beneficial uses creates an impression of a tiered system or priorities by the sentence. That shouldn't be the case. Water would be shifted from power generation to a broad spectrum of other beneficial uses - no need to specifically call out some unless you call out all	X change made
John Mills	9/18/2003	9/16/2003	Recommendations	DON'T BELIEVE THAT IT IS APPROPRIATE TO LIMIT STATE FUNDS JUST BASED ON STATEWIDE BENEFITS.	X Changed text to focus on funding needs. Funding preferences are discussed in Chapter 6 - State Role &
Stephen Wald	9/18/2003	9/16/2003	Issues	The CEC analysis is preliminary, but questions the assumption that energy losses are a serious barrier to reallocating water from hydropower to other beneficial uses. I encourage you to review the CEC doc and revise and demote the "major issues" discussion over lost hydropower generation.	X Changed text to acknowledge the CEC findings, but based on comments from CEC staff also discuss that many projects must still undergo relicensing and effects must be evaluated.
Stephen Wald	9/18/2003	9/16/2003	Issues	Delete sentence on replacement energy concerns	Y Did not change because is a potential concern with remaining relicensing efforts
Steve McCaulay	9/18/2003	8/29/2003	Current Status	The discussion seems to imply that this is a new tool that should be used in the future. System reop has occurred since the 1970's.	X Added example of changing delivery decisions from firm yield approach to risk based approach.
Steve McCaulay	9/18/2003	8/29/2003	Potential Benefits	As to opportunities for water supply gain with closer cooperation between the CVP and SWP, the discussion leaves an impression that this has been an untapped tool.	X added example of CVP and SWP coordination under the COA.
Several		9/16/2003	Several	Need to incorporate public trust into system reoperation	X Have included reference to public trust in introduction, current extent, issues, and recommendations sections
Urban Caucus	10/1/2003	9/22/2003	Current Status	the discussion seems to imply that this is a new tool that should be used in the future -- with great potential.	X Added example of changing delivery decisions from firm yield approach to risk based approach.
Urban Caucus	10/1/2003	9/22/2003	Potential Benefits	As to opportunities for water supply gain with closer cooperation between the CVP and SWP, the discussion leaves an impression that this has been an untapped tool.	X added example of CVP and SWP coordination under the COA.
Grace Chan	10/1/2003	9/22/2003	Introduction	P 1, first paragraph, "System reoperation is restructuring...to improve the beneficial uses of a fixed and limited water supply." Eliminate the "fixed and limited" as it is not necessarily true.	X Changed to "to utilize the flexibility of the system to meet competing beneficial uses".
Grace Chan	10/1/2003	9/22/2003	Issues	P 7, Water Quality, " Reoperation using surface to actively recharge groundwater banks may be limited by existing groundwater or recharge water quality." Statement does not make	X Added word "water" after surface
CA Fish & Game	10/21/2003	9/22/2003	Recommendations	[Include ecosystem restoration as a co-equal objective in System reoperation, or partner with restoration projects, to achieve net environmental benefit from System reoperation]	X Added recommendation to give priority for funding and technical assistance to system reoperation projects that provide multiple benefits.
Carolyn Yale	10/29/2003	9/22/2003	Introduction	5-137: Examples of system reoperation, first bullet, add " or managing for water quality."	X Changed sentence to address comment

PT Workgroup	10/29/2003	9/23/2003	Recommendations	<p>System Re-op: Recommendations 1 and 2 for this strategy suggest that Somebody should review, and provide assistance to Somebody Else for evaluating, the possible impacts of System Re-op initiatives in several fields including public trust. I suggest that the Somebodies be identified and given specific responsibility for minding and representing public trust concerns.</p>	<p>Added another recommendation: Operators of water projects and facilities should evaluate the potential project specific and cumulative benefits and impacts to beneficial uses that may occur from system reoperation of federal, state or local facilities including effects on water supply, the environment, public trust resources, recreation, statewide energy generation, and navigation. State agencies carrying out or approving reoperation must exercise their public trust responsibilities to protect trust resources where feasible.</p>
PT Workgroup	10/29/2003	9/23/2003	Recommendations	<p>a very short initial statement on public trust responsibilities could be strengthened by noting that the Mono Lake court also ruled that some public uses might receive enhanced protection over contemplated private uses and this revised the set of questions needing attention in reoperation decisions.</p>	<p>Y A more detailed description of the public trust is found in Chapter 2.</p>